

From: [Jennifer Gaines](#)
To: [Bill Jacobs](#)
Cc: [Dan Peacock](#)
Subject: Re: Fw: Rodent Bait Stations
Date: 06/08/2011 07:55 AM

You're welcome

Jennifer Gaines
Wildlife Biologist
U.S. Environmental Protection Agency
Insecticide-Rodenticide Branch
Registration Division (7505P)

Tel: 703 305-5967
Fax: 703 305-6309

▼ Bill Jacobs---06/08/2011 07:29:57 AM---That is how I remembered it as well.
Thank you for the quick reply. From: Jennifer Gaines/DC/USEPA/

From: Bill Jacobs/DC/USEPA/US
To: Jennifer Gaines/DC/USEPA/US@EPA
Cc: Dan Peacock/DC/USEPA/US@EPA
Date: 06/08/2011 07:29 AM
Subject: Re: Fw: Rodent Bait Stations

That is how I remembered it as well. Thank you for the quick reply.

▼ Jennifer Gaines---06/08/2011 06:50:08 AM---Hi Bill, Yes the number of adults is
still 100. I recall doing a couple of reviews where I was no

From: Jennifer Gaines/DC/USEPA/US
To: Bill Jacobs/DC/USEPA/US@EPA
Cc: Dan Peacock/DC/USEPA/US@EPA
Date: 06/08/2011 06:50 AM
Subject: Re: Fw: Rodent Bait Stations

Hi Bill,

Yes the number of adults is still 100. I recall doing a couple of reviews where I was not aware of the 100 adult decision with the age range of 18-70 and had noted that on some reviews. You then verified it for me. So since then, I have accepted the adult studies with 100 adults.

Thanks for asking,

Jen

Jennifer Gaines
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U.S. Environmental Protection Agency
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Registration Division (7505P)

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Fax: 703 305-6309

▼ Bill Jacobs---06/07/2011 02:22:37 PM---See the e-mails string below, which goes back more than a year. Note especially the comments relate

From: Bill Jacobs/DC/USEPA/US
To: Dan Peacock/DC/USEPA/US@EPA, Jennifer Gaines/DC/USEPA/US@EPA
Date: 06/07/2011 02:22 PM
Subject: Fw: Rodent Bait Stations

See the e-mails string below, which goes back more than a year. Note especially the comments related to the age and sex make-up of the group or adult subjects used in the adult utility test for refillable bait stations. My reply on 1/14/10 reflected a decision (made by others) in a meeting on that and other topics subsequent to issuance of the RMD. As far as I am aware, that decision (100 adults, aged 18-70 with 50 males & 50 females) still holds. Please let me know whether you have any recent contrary information. The protocol (1.228) circulated with the RMD has not been modified.

I hope to be able to respond to Denise Keyes tomorrow as her facility is about to embark on another adult utility test.

----- Forwarded by Bill Jacobs/DC/USEPA/US on 06/07/2011 02:13 PM -----

From: "Denise Keyes" <denise@crr.net>
To: Bill Jacobs/DC/USEPA/US@EPA
Date: 06/07/2011 02:11 PM
Subject: FW: Rodent Bait Stations

Hi Bill:

The email below is the adult test panel age breakdown you provided to us in January 2010. Please let me know if this is acceptable for testing the rodent refillable bait stations. One of the issues that came out of the efficacy review was that we did not test any adults between the ages of 71-75. We are looking for clarification of the correct ages to test.

Thank you for your assistance.

Denise Keyes

Regional Site Manager
Child Related Research, Inc.
2605 East 3300
Salt Lake City, UT 84109
(801) 467-9440 ext. 105

-----Original Message-----

From: Jacobs.Bill@epamail.epa.gov
[mailto:Jacobs.Bill@epamail.epa.gov]
Sent: Thursday, January 14, 2010 12:51 PM
To: Denise Keyes
Cc: Parsons.Laura@epamail.epa.gov
Subject: Re: Rodent Bait Stations

For the adult-use test, the sex ratio has been revised to 50:50 with approximately equal distribution across the 18-70 years age range (e.g., 20 males and 20 females ages 18-38 years, 20 males and 20 females ages 39-59 years, and 10 males and 10 females ages 60-70 years.

The levels of effectiveness remain as indicated in the protocol versions that were attached to the 2008 Rodenticide Risk Mitigation Decision. The higher percent success (non-failure) for the first 50 subjects in the child test is based upon a statistical model which indicates that, if there are only 2 failures over the first 50 subjects, the product under test would be extremely unlikely to fail if tested with the full complement of 200 children aged 42-51 months.

"Child-resistance" is an index used to assess the safety of closed packages. As applied to rodenticide bait stations, "tamper-resistance" addresses a station's suitability when evaluated against the 8 criteria indicated in PR Notice 94-7. One aspect of those criteria is the station's ability to isolate bait from young children. Protocol 1.229 is used to assess that component of tamper-resistance. In contrast to containers used in child-resistant packaging tests, rodenticide bait stations are tested with children in an "open" condition, in the sense that the passages which make bait accessible to rodents are not closed off for child testing.

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| From: |
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> | "Denise Keyes" <denise@crr.net>
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> To: |
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Thank you for your assistance with these questions.

Kindest regards,

Denise Keyes
Child Related Research, Inc.

Internal Virus Database is out of date.
Checked by AVG - www.avg.com
Version: 8.5.425 / Virus Database: 270.14.67/2505 - Release
Date: 11/15/09
19:50:00